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June 28, 2019

**BY ECF & EMAIL**

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: United States v. Konstantin Ignatov, S7 17 CR 630 (ER)**

Dear Judge Ramos:

I am writing on behalf of defendant Konstantin Ignatov and in response to the government's June 27, 2019 Letter seeking Mr. Ignatov's detention ("Detention Ltr."). As set forth in our June 17, 2019 Bail Application ("Bail Ltr."), Mr. Ignatov hardly presents the "unprecedented risk of flight" characterized by the government. Detention Ltr. at p. 1. To the contrary, numerous examples exist wherein less bailable defendants – citizens and non-citizens alike – were granted pretrial release. The same result should follow here.

**First**, and most importantly, unlike bailed defendants Marc Dreier, who used his eponymously named law firm as a means to commit massive frauds even after he was arrested (Bail Ltr. at p. 17) and Bernie Madoff, who lied to generations of investors and government officials as the chairman of his own investment company, Mr. Ignatov's involvement in the purported OneCoin fraud was not only a relatively brief period of time but his role as any kind of leader is alleged to be *a matter of months*. The government's own discovery makes clear that Mr. Ignatov's position at OneCoin was as his sister Ruja's lowly assistant until her disappearance at the end of October, 2017. Ruja, the purported mastermind of the OneCoin scheme which is alleged to have begun in 2014, hired her brother at the very end of June 2016 for the most menial of clerical tasks.<sup>1</sup> Specifically, the emails produced by the government are rife with examples

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<sup>1</sup> The government is mistaken in claiming that Mr. Ignatov began his employment at OneCoin as a personal assistant to his sister "in approximately 2015" – he was still living in Germany and working for Porsche until May 2016. See Detention Letter at p. 7. Indeed, Mr. (continued...)

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that establish Mr. Ignatov's lowly position within OneCoin through late 2017, with Ruja copying the defendant on orders for clothing, jewelry,<sup>2</sup> and household items,<sup>3</sup> her being upset with not having tickets for Fashion Week,<sup>4</sup> as well as requests for the defendant to schedule meetings for her. E.g., September 19, 2017 Email of Ruja Ignatova to Konstantin Ignatov, attached as Exhibit H ("Hi Konstantin, Can you schedule a meeting Friday afternoon with me and Vesi?").

One email from September 2017 makes clear that Mr. Ignatov remained in his administrative position even after a full year of employment with OneCoin, with Ruja directing an individual to "send [her] brother the invoice," for an order of handbags (see September 26, 2017 Email of Ruja Ignatova to Konstantin Ignatov and Kelli Emerson, attached as Exhibit I), and in another dated July 26, 2017, Ruja refers to her brother as her "assistant." See July 26, 2017 Email of Ruja Ignatova to Konstantin Ignatov, attached as Exhibit J. In yet another email, Ruja berates him for maintaining a disorganized filing cabinet and for OneCoin's purchase of cheap blue and red pens. See October 10, 2016 Email of Ruja Ignatova to Konstantin Ignatov, attached as Exhibit K.

Our point in describing these emails is that Konstantin's major OneCoin responsibilities of picking up his sister's earrings and arranging for ceramic flowers to be delivered to her home

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<sup>1</sup>(...continued)

Ignatov's labor agreement – a document that is required to be filed by corporations in Bulgaria – establishes that Mr. Ignatov began working for OneCoin in late June 2016 in the position of "administrative secretary." See June 30, 2016 National Revenue Agency Reference, attached as Exhibit A.

<sup>2</sup> See, e.g., September 29, 2017 Email of Ruja Ignatova to Konstantin Ignatov and Kelli Emerson regarding the purchase of a "Caroline Herrera Mikimoto Emerald Diamond Pearl Necklace," attached as Exhibit B; September 28, 2017 Email of Ruja Ignatova to Konstantin Ignatov and JaneFinds, attached as Exhibit C; September 26, 2017 Email of Ruja Ignatova to Konstantin Ignatov and Kelli Emerson regarding the purchase of "Van Cleef & Arpels Late-20th Century Ruby Diamond Platinum Mystere Earrings," attached as Exhibit D.

<sup>3</sup> See, e.g., September 22, 2017 Email of Ruja Ignatova to Konstantin Ignatov and Lucy Lesley regarding the purchase of china, attached as Exhibit E; August 1, 2017 Email of Ruja Ignatova to Konstantin Ignatov and Lucy Lesley, attached as Exhibit F (Ruja: "for my penthouse in London I am buying now plates and glasses, do you stock?").

<sup>4</sup> See, e.g., September 13, 2017 Email of Ruja Ignatova to Konstantin Ignatov and Q Bulgaria, attached as Exhibit G ("Fashion week is in less than 2 weeks you did not get back to us with any good events or anything else proactive").

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in October of 2017 somehow morphed into his becoming a “high level executive” by December of 2017 (Complaint at ¶ 7) and rising to “the top leadership position in mid-2018.” Id. at ¶ 6. It is simply unrealistic to believe that the defendant could and would take over his sister’s position as the leader of OneCoin, an alleged multi-billion dollar global fraud, with hundreds of employees and moving parts, seemingly overnight. Regardless, even taking these fanciful leadership allegations as true, the length of time that Mr. Ignatov allegedly operated as a leader of OneCoin – *approximately eight months* until his arrest at the beginning of March 2019 – is minuscule compared to the duration that Dreier and Madoff operated their frauds.

The circumstances surrounding Ruja’s disappearance belies the claim that Konstantin became the leader of the OneCoin fraud immediately thereafter. The government claims that Ruja left immediately after receiving confidential information about a sealed indictment pending against her in the Southern District of New York. See Detention Ltr. at p. 9 (“The defendant’s own sister, Ruja, herself successfully staged a total disappearance almost immediately after sealed charges were filed against her by the United States”). However, despite his alleged ascension to the top spot at OneCoin, Konstantin was seemingly not notified of the sealed indictment against Ruja in the United States as he not only remained in public view, but traveled to the United States as soon as eight months later in July of 2018. Id. Therefore, if Ruja and the defendant were so close as to infect his presumptive right to pretrial release due to her flight, wouldn’t she have informed him of her indictment in the United States for her role as the leader of OneCoin? Wouldn’t Mr. Ignatov have disappeared as well – or at least avoided traveling to the United States? Plainly he did not. And if Mr. Ignatov was the most significant player in OneCoin as the government espouses, why wasn’t he indicted with Ms. Ignatova in October of 2017 – or with alleged co-conspirator Mark Scott a year later?

**Second**, as compared to the defendant in Boustani – a case repeatedly relied upon by the government for the proposition that bail should be denied in this instance – Mr. Ignatov’s own actions evince far less a risk of flight. See Detention Ltr. at pp. 4-6. As Judge Kuntz observed in that case, Jean Boustani was alleged by the government to have “provided work visas bearing false information to... co-conspirators, assisted them in obtaining ... bank accounts, and took steps to avoid detection,” which pointed to a “a demonstrated ability to bribe government officials, and to use fraudulent documents to assist co-conspirators in their travel to foreign jurisdictions.” United States v. Boustani, 356 F.Supp.3d 246, 254 (E.D.N.Y. 2019) (Kuntz, J.). But Mr. Ignatov never falsified information for travel documents, never provided false work visas and did not travel to the United States under a false name. It was his use of his given name that triggered his own arrest.

Further, the government’s attempts to equate Mr. Ignatov to Reza Zarrab similarly fail. See Detention Ltr. at pp. 5-6. As Judge Berman observed in that case, Zarrab was alleged to have aided Iran in avoiding international financial sanctions and “[t]he entities aided by Zarrab ...

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were arms of the IRGC [Iran's Islamic Revolutionary Guard], which is notorious for its facilitation of terrorism ...." United States v. Zarrab, No. 15 CR 867 (RMB), 2016 WL 3681423, at \*3 (S.D.N.Y. June 16, 2016) (emphasis supplied). The government also alleged in response to his bail application that "Zarrab's conduct ... enabled Iran to engage in [a] full course of conduct that threatens the United States." Id. Further, as contended by the government, Zarrab lied to Pretrial Services and "minimized his business income from several billion dollars to less than a million dollars," lied concerning his ability to speak multiple languages, and maintained three passports: one each from Turkey, Macedonia and Iran. Id. at \*5. Mr. Ignatov, who was an administrative assistant at OneCoin until at least the end of October 2017 as demonstrated by the discovery provided thus far in the case, cannot be likened to Zarrab. While the government asserts that he lied about past drug use, the value of his home, and his financial obligations, nothing nears the level of dishonesty (or dangerousness) alleged in Zarrab. In addition, when suggesting that Mr. Ignatov lied about his finances in his pretrial services interview, the government ignores the obvious fact that English is not Mr. Ignatov's first or even second language.<sup>5</sup>

**Third**, the government's proffered conflict of interest caused by Mr. Ignatov paying the security firm potentially guarding him is far overblown. Detention Ltr. at p. 5 & FN 1. We will happily agree to let the government approve the selection of the security company and are even willing to let the government pay the company directly – with funds provided by the defendant.

**Fourth**, the government asserts in its papers that Mr. Ignatov's "access to substantial financial resources," weighs against pretrial release, but it is this very detriment to a defendant's ability to be bailed that may be countered by the use of self-funded armed guards. See Detention Ltr. at p. 4. As Judge Rakoff eloquently observed in his decision to grant bail to Marc Dreier:

It cannot be gainsaid that many kinds of bail conditions favor the rich, and, conversely, that there are many defendants who are too poor to afford even the most modest of bail bonds or financial conditions of release. This is a serious flaw in our system. But it is not a reason to deny a constitutional right to someone who, for whatever reason, can provide reasonable assurances against flight.

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<sup>5</sup> In this vein, the government incorrectly claimed in the Complaint and in its submission that Mr. Ignatov referred to the funds contained within UAE investment fund accounts, purportedly holding OneCoin fraud proceeds, as "our \$." Detention Ltr. at p.7, Complaint at ¶¶ 14 (d)-(e), 52 (a)-(g). A quick review of the pertinent chat provided in discovery reveals that it was not Mr. Ignatov but an individual named Velizara who made that comment.

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United States v. Dreier, 09 CR 85 (JSR) (Order dated February 5, 2009) (emphasis supplied). Here, as with Dreier, the defendant should be permitted to counter the claim that he cannot be entrusted to pretrial release due to his access to financial resources with an offer to use those very same resources to make his flight virtually impossible.

**Fifth**, the government's fears that Mr. Ignatov could flee to his home country of Germany, which refuses to extradite its own nationals, are easily ameliorated. See Detention Ltr. at p. 7 and FN 3. While the conditions of release that we propose would make it virtually impossible for Mr. Ignatov to flee, he would be willing to affirmatively waive any future extradition to the United States from any country prior to his release on bail.

**Sixth**, the fear of any continued economic harm cannot be found by clear and convincing evidence. See 18 U.S.C. § 3142 (f)(2)(B); Detention Ltr. at pp. 10-11. Without access to the internet or a cellphone, and with only Court or government pre-approved visitors permitted at his residence, it would be virtually impossible for Mr. Ignatov to be responsible for any additional economic harm. And by agreeing not to conduct any affairs relating to OneCoin or have contact with OneCoin employees while on bail, Mr. Ignatov arguably posses *less* of such a threat than a similarly situated incarcerated defendant who is not required to make these agreements. Of course, the defendant will agree to have his residence searched without advance notice and his telephone tapped by the government should he be released on bail.

For these reasons and those presented in our June 17, 2019 Bail Application, Mr. Ignatov should be granted pretrial release.

Respectfully submitted,



Jeffrey Lichtman

Encs.

cc: All counsel (by ECF & email)

# **EXHIBIT A**

БДИ

РЕДАКЦИЯ

Съобщението е достъпно в Електронна обработка на данни на Управление по данни на Република България. Електронна обработка на данни е процес, при който данните са обработвани чрез компютърни системи и програми. Е-mail адрес: [www.confident.bg.com](http://www.confident.bg.com).

Translation from Bulgarian language

Page 1 of 1

**NATIONAL REVENUE AGENCY**  
**UIN under BULSTAT 131063188**

**Notification under Art. 62, para. 5 from Labor Code**

**Outgoing No. 22388163284351 / 30.06.2016 16:39:03**

**REFERENCE**

**for accepted and rejected notifications under Art. 62, para. 5 from Labor Code with incoming No. 22388163284351 / 30.06.2016**

**From**

Employer:	ONE NETWORK SERVICES
UIN under BULSTAT	201531600
Address	6A Petko Rachov Slaveikov Square, SOFIA, STOLICHNA Municipality, SOFIA District
Produced information refers to:	
Total number of submitted notifications under Art. 62, para. 5:	1
1. Number of notifications (records) - regular:	1
2. Number of notifications (records) - corrections:	0
3. Number of notifications (records) - deleted:	0
4. Number of incorrect notifications:	0
5. Number of validated notifications under Attachment No. 5:	0 for 0 number of persons.
6 Number of incorrect notifications under Attachment No.5:	0 за 0 брой лица.

**Number of validated notifications under Art. 62, para. 5: 1**

**Validated notifications from contracts agreed after 01.01.2003:**

Personal Number: 3076407400 - KONSTANTIN null IGNATOV - ADMINISTRATIVE SECRETARY (regular data)

**Rejected notifications under Art. 62, para. 5: 0**

**Rejected notifications under Attachment No. 5: 0 for 0 number of persons.**

[https://inetdec.nra.bg/pls/pub/DEC2009.IPUBFUD\[EC.showResult?pid=65025628](https://inetdec.nra.bg/pls/pub/DEC2009.IPUBFUD[EC.showResult?pid=65025628)

20.3.2019

I, the undersigned Galya Stoyanova Pavlova, attest to the authenticity of the Bulgarian - English translation I have made of the following attached document. The translation consists of 1 page.

Translator: Galya Stoyanova Pavlova



страница 1 от 1

НАЦИОНАЛНА АГЕНЦИЯ ЗА ПРИХОДИТЕ  
ЕИК по БУЛСТАТ 131063188

Уведомление по чл. 62, ал. 5 от КТ

Изх. № 22388163284351 / 30.06.2016 16:39:03

**С П Р А В К А**

За приемни и отхвърлени уведомления по чл. 62, ал. 5 от Кодекса на труда  
с входящ № 22388163284351 / 30.06.2016

От

Работодател:	ЮАН НЕТУЪРК СЪРВИСЕС
ЕИК по БУЛСТАТ :	201531600
Адрес:	гр.СОФИЯ, община СТОЛИЧНА, област СОФИЯ, жк .пл. "Петко Рачов Славейков" №6А бл.. вх.. ет.. ап.,

Представената информация е за:

Общ брой подадени уведомления по чл. 62. ал. 5:	1
1. Брой уведомления (записи)-редовни :	1
2. Брой уведомления (записи)-корекции :	0
3. Брой уведомления (записи)-заличаване :	0
4. Брой грешни уведомления :	0
5. Брой заварени уведомления приложение № 5 :	0 за 0 брой лица.
6. Брой грешни уведомления по приложение № 5 :	0 за 0 брой лица.

Брой заварени уведомления по чл. 62, ал. 5: 1

Заварени уведомления за съсочени след 01.01.2003 г. договори:

ЕГИ: 3076-107-400-КОСТАНТИН ПИИ ИГНАТОВ-АДМИНИСТРАТИВЕН СЕКРЕТАР  
(редовни данни)

Отхвърлени уведомления по чл. 62, ал. 5: 0

Отхвърлени уведомления по приложение № 5: 0 за 0 брой лица.

Ръчно 30.06.2016 г. K. Чупаров

## **EXHIBIT B**

10	<p><b>Timestamp:</b> 9/29/2017 10:29:23 AM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> kelli@1stdibs.com Kelli Emerson</p> <p><b>To:</b> konstantin@onecoin.eu Konstantin Ignatov</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Re: Van Cleef &amp; Arpels Late-20th Century Ruby Diamond Platinum 'Mystere' Earrings Ref: LU89309892</p> <p><b>Body:</b> Ok. Lets proceed with all. Sent from my iPad, please excuse the brevity and possible mistakes On 28 Sep 2017, at 23:17, Kelli Emerson &lt;kelli@1stdibs.com&gt; [mailto:kelli@1stdibs.com] wrote: Hi Ruja, Regarding theCaroline Herrera for Mikimoto Emerald Diamond Pearl Necklace [<a href="https://www.1stdibs.com/jewelry/necklaces/choker-necklaces/caroline-herrera-mikimoto-emerald-diamond-pearl-necklace/id_i_2638323/">https://www.1stdibs.com/jewelry/necklaces/choker-necklaces/caroline-herrera-mikimoto-emerald-diamond-pearl-necklace/id_i_2638323/</a>] . please see the dealer's notes below: This necklace was produced in the 1990's by Mikimoto to promote pearls, which had seen a bit of a decline in popularity. There were 12 unique pieces made in collaboration with Carolina Herrera, which were distributed to celebrities and valued clients. Most of these pieces were not sold, they were given as gifts, so it is not possible to estimate the original retail value of this piece. However, the dealer would like to assure you of the quality and craftsmanship of this piece. The settings for each diamond, emerald, and pearl <b>Item was truncated due to length</b> Body file: mes-10.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MDS:</b> f2634db80bcb72d1590e8f3 49cd744e4</p>
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## **EXHIBIT C**

11	<p><b>Timestamp:</b> 9/28/2017 12:46:13 PM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> JaneFinds</p> <p><b>To:</b> sales@janefinds.com JaneFinds Sales</p> <p><b>konstantin@onecoin.eu</b> Konstantin Ignatov</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Re: INV03274</p> <p><b>Body:</b> I think went out yesterday Sent from my iPad, please excuse the brevity and possible mistakes On 27 Sep 2017, at 20:39, JaneFinds™ &lt;jane@janefinds.com&gt; [mailto:jane@janefinds.com] &gt; wrote: Hi, please confirm the wire was sent, thank you Jane /// Jane Angert JaneFinds™ Co-Founder, President 201.312.4987 jane@janefinds.com [mailto:ross@janefinds.com] www.janefinds.com [http://www.janefinds.com] www.baginizer.com [http://www.baginizer.com] @janefinds [https://www.instagram.com/janefinds/] - IG @janefinds [http://www.twitter.com/janefinds] - Twitter @janefinds [https://www.facebook.com/JaneFinds/] - FB @janefinds [http://stores.ebay.com/JaneFinds] - eBay JaneFinds and Baginizer are Registered Trademarks of JaneFinds LLC On Sep 26, 2017, at 9:22 AM, Dr. Ruja Ignatova &lt;ruja@onecoin.eu&gt; [mailto:ruja@onecoin.eu] &gt; wrote: we will pay via wire not paypal. it's also better for you as fees are lower Sent from my iPh <b>Item was truncated due to length</b> Body file: mes-11.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MD5:</b> ab729fe05b9c76214cc1222 0913b8c26</p>
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## **EXHIBIT D**

15	<p><b>Timestamp:</b> 9/26/2017 9:53:41 PM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> kelli@1stdibs.com Kelli Emerson  konstantin@onecoin.eu Konstantin Ignatov</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Re: Van Cleef &amp; Arpels Late-20th Century Ruby Diamond Platinum 'Mystere' Earrings Ref: LU89309892</p> <p><b>Body:</b></p> <p>Hi</p> <p>They are very beautiful but not my style unfortunately. Thank you of thinking of me. I made some offers today - let us see how the sellers react and then we do one payment and ship the things</p> <p>Tx!</p> <p>Sent from my iPad, please excuse the brevity and possible mistakes</p> <p>On 26 Sep 2017, at 18:06, Kelli Emerson &lt;kelli@1stdibs.com&gt; [mailto:kelli@1stdibs.com] &gt; wrote:</p> <p>Dear Ruja,</p> <p>I hope this finds you well. I am working with Konstantin to confirm and ship your pending orders, however, I wanted to contact you regarding a listing from one of our Recommended Dealers. Macklowe Gallery is offering their stunning Van Cleef &amp; Arpels Late-20th Century Ruby Diamond Platinum 'Mystere' Earrings [<a href="https://www.1stdibs.com/jewelry/earrings/clip-on-earrings/van-cleef-arpels-late-20th-century-ruby-diamond-platinum-mystere-earrings/id-i_309892/">https://www.1stdibs.com/jewelry/earrings/clip-on-earrings/van-cleef-arpels-late-20th-century-ruby-diamond-platinum-mystere-earrings/id-i_309892/</a>] at a special price of \$275,000. The previous asking price was \$325,000, however, they have offered a deep discount to you as a favored client of 1stdib</p> <p><b>Item was truncated due to length</b></p> <p><b>Body file:</b> mes-15.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MD5:</b> ca3a04b956924fb39601479 80ce7f1ee</p>
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## **EXHIBIT E**

21	<p><b>Timestamp:</b> 9/22/2017 12:18:51 PM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> lucy@harlequin-london.com Lucy Lesley</p> <p><b>To:</b> konstantin@onecoin.eu Konstantin Ignatov</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Re: MOTTAHEDEH - TABACCO LEAF - COLLECTION</p> <p><b>Body:</b></p> <p>Hi Lucyhx for following up. sometimes I get so busy and forget the mails :). we are interested in it. pls make it however for 18 and make sure there are 3 bowls/plates each and two soup terrines. we will need one coffee can and two teapots</p> <p>also what are these epergines? Maybe you send a catalogue of the non Standard Pieces</p> <p>pls adjust offer and swnd back to me</p> <p>Sent from my iPhone</p> <p>On Sep 22, 2017, at 11:50, Lucy Lesley &lt;lucy@harlequin-london.com [mailto:lucy@harlequin-london.com] &gt; wrote:</p> <p>Dear Dr. Ruja,</p> <p>I hope this email finds you well.</p> <p>I just wondered whether you are still interested in the attached collection I have quoted for?</p> <p>Looking forward to hearing your thoughts</p> <p>Kind regards,</p> <p>Lucy</p> <p>Lucy Lesley</p> <p>Account Manager</p> <p>[http://www.harlequin-london.com/]</p> <p>Telephone: +44 (0) 20 7384 1911 [tel:4402073841911]</p> <p>Email: lucy@harlequin-london.com [mailto:lucy@harlequin-london.com]</p> <p>Showroom: 585 Kings Road,</p> <p>Fulham, Lon</p> <p>Item was truncated due to length</p> <p>Body file: mes-21.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MD5:</b> 047d5f5cd66b47c6aca46d1aecf52ce9</p>
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## **EXHIBIT F**

95	<p><b>Timestamp:</b> 8/1/2017 11:40:59 AM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> alice@harlequin-london.com Alice Bulgin</p> <p><b>To:</b> konstantin@onecoin.eu konstantin@onecoin.eu</p> <p>lucy@harlequin-london.com Lucy Lesley</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Re: DR RUJA - MOSER ITEMS - PROFORMA INVOICE 14525</p> <p><b>Body:</b></p> <p>Dear Alice</p> <p>Was all received for both orders?</p> <p>I have also a question - for my penthouse in London I am buying now plates and glasses, do you stock</p> <p><a href="https://www.mottahedeh.com/tobacco-leaf-dinner-plate.html">https://www.mottahedeh.com/tobacco-leaf-dinner-plate.html</a></p> <p>And</p> <p><a href="https://www.artedona.com/en/Dinnerware/Dinnerware-decorated/Raynaud-Attraction-Or-Platine.html">https://www.artedona.com/en/Dinnerware/Dinnerware-decorated/Raynaud-Attraction-Or-Platine.html</a></p> <p>Glasses:</p> <p>Probably from Moser, i am checking what i like</p> <p>Best</p> <p>Ruja</p> <p>Sent from my iPad, please excuse the brevity and possible mistakes</p> <p>On 21 Jul 2017, at 12:56, Alice Bulgin &lt;alice@harlequin-london.com [mailto:<a href="mailto:alice@harlequin-london.com">alice@harlequin-london.com</a>] &gt; wrote:</p> <p>Dear Dr Ruja &amp; Konstantin,</p> <p>I can confirm that we have received payment in full for order 14522 and this will be processed today.</p> <p>Please see attached your separate proforma 14525 for the outstanding Moser items, along with our bank details.</p> <p>I will confirm with you as soon as this payment has been received.</p> <p>Kind regards,</p> <p>Alice</p> <p>Alice Bulgin</p> <p>Senior Account Manager</p> <p>&lt;image0&gt;</p> <p>Item was truncated due to length</p> <p>Body file: mes-95.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MD5:</b> 544d19924de94e34adc1fd8 7a2376cef</p>	
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## **EXHIBIT G**

46	<p><b>Timestamp:</b> 9/13/2017 9:33:55 PM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> konstantin@onecoin.eu Konstantin Ignatov qbulgaria@quintessentially.com Q Bulgaria</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Re: Quintessentially   Paris Update</p> <p><b>Body:</b> Dear All I must say that I am less than impressed with the level of follow up and content offered Whatever we asked for it has been cumbersome and slow. I would prefer to have also someone from your Paris office directly communicating with us. Fashion week is in less than 2 weeks. You did not get back to us with any good events or anything else proactive I expect to hear from your supervisor too and to have matters fixed Best regards Dr. Ignatova Sent from my iPad, please excuse the brevity and possible mistakes On 13 Sep 2017, at 21:29, Konstantin Ignatov &lt;konstantin@onecoin.eu&gt; [mailto:konstantin@onecoin.eu] wrote: Von meinem iPhone gesendet Anfang der weitergeleiteten EMail: Von: Q Bulgaria &lt;qbulgaria@quintessentially.com&gt; [mailto:qbulgaria@quintessentially.com]&gt; Datum: 13. September 2017 um 12:32:38 OESZ An: "konstantin@onecoin.eu" [mailto:konstantin@onecoin.eu] &lt;konstantin@onecoin.eu&gt; [mailto:konstantin@onecoin.eu]&gt; Betreff: Quintessential Item was truncated due to length Body file: mes-46.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b> <b>MD5:</b> b503a9df447cd23cbf220e8 cae94ee77</p>
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# **EXHIBIT H**

23	<p><b>Timestamp:</b> 9/19/2017 2:39:39 PM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> konstantin@onecoin.eu Konstantin Ignatov</p> <p><b>veselina.valkova@onelife.eu</b> 'veselina Valkova'</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Online Casino</p> <p><b>Body:</b> Hi Konstantin Can you schedule a meeting on Friday afternoon with me and Vesi? I would like to discuss the online casino R Sent from my iPad, please excuse the brevity and possible mistakes <b>Body file:</b> mes-23.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MD5:</b> 08d155f23c0d41bdf686cf0c 957d34e3</p>
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# **EXHIBIT I**

18	<p><b>Timestamp:</b> 9/26/2017 9:27:09 AM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> JaneFinds konstantin@onecoin.eu Konstantin Ignatov</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Re: Early Access JaneFinds September 25th</p> <p><b>Body:</b></p> <p>Hi I will take the white/gold croco and the bubblegum. Pls send my brother the invoice so we can handle it Best R Sent from my iPad, please excuse the brevity and possible mistakes On 25 Sep 2017, at 01:53, JaneFinds™ &lt;jane@janefinds.com [mailto:jane@janefinds.com] &gt; wrote The bubblegum is new and I cant reserve without a deposit. I will do my best to hold for you. We have Christies handbags UK that want the bag and another two private clients. The bag is priced really fair let me know soon. /// Jane Angert JaneFinds™ Co-Founder, President 201.312.4987 jane@janefinds.com [mailto:ross@janefinds.com] www.janefinds.com [http://www.janefinds.com] www.baginizer.com [http://www.baginizer.com] @janefinds [https://www.instagram.com/janefinds/] - IG @janefinds [http://www.twitter.com/janefinds] - Twitter @janefinds [https://www.facebook.com/JaneFinds/] - FB @janefinds [http://stores.ebay.com/JaneFinds] - eBay JaneFinds and Baginizer Item was truncated due to length Body file: mes-18.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b> <b>MDS:</b> 7b6d84e2f6d3606a8a9c76a f9eb75094</p>
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## **EXHIBIT J**

100	<p><b>Timestamp:</b> 7/26/2017 4:55:37 PM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> konstantin@onecoin.eu Konstantin Ignatov</p> <p><b>Direction:</b> Incoming</p>	<p><b>Subject:</b> Fwd: percossi papi order</p> <p><b>Body:</b> Il 26/07/2017 15:43, Dr. Ruja Ignatova ha scritto: Dear Valeria Thank you so much, I forwarded the proforma to my assistant. Sounds amazing about the other earrings. You guys have created an amazing label Best Ruja Sent from my iPad, please excuse the brevity and possible mistakes On 26 Jul 2017, at 16:27, Percossi Papi Office &lt;<a href="mailto:info@percossipapi.com">mailto:info@percossipapi.com</a>&gt; <a href="mailto:info@percossipapi.com">info@percossipapi.com</a> [mailto:<a href="mailto:info@percossipapi.com">info@percossipapi.com</a>]&gt; wrote: Dear Ruja, I send you attached a proforma invoice of jewels immediatly available from your choise . Anyway we are able to produce all the other ones for sure. We will send you in next days the list with photos and prices of all the remaining items you asked for. We are going to stop for summer break but we could organize the rest of your order for september shipment if you agree. I will be at your disposal for any further informations. Best regards Valeria &lt;U Item was truncated due to length Body file: mes-100.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MD5:</b> df1b7d82c0296760a3c487a 345e207e2</p>	
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# **EXHIBIT K**

150	<p><b>Timestamp:</b> 10/10/2016 12:37:13 PM(UTC+3)</p> <p><b>From:</b> ruja@onecoin.eu Dr. Ruja Ignatova</p> <p><b>To:</b> konstantin@onecoin.eu Konstantin Ignatov  veska.ignatov@ravenr.com Maitchi</p>	<p><b>Subject:</b> Chaos in the office</p> <p><b>Body:</b> Shkafa otwan e bezobrazie! Pretapkan s bokluzi. Da ne goworim che niakoi e kupuwal nai ewtinite cherwieni i sini himikalki. Molia wi stegnete se. Sini himikalki iskam korporatiwni na onecoin – marketinga da naprawiat, blockcheta winagi da ima golemi i malki, pak s ONECOIN ne s RAVENR logo (pak marketing), i da ne se kupuwat bokluzi himikalki a ot hubawite stabilo tankopisz. Sram me e kak w momenta organizirate ofisa, a towa da se naprawi trae 30 min. Oswen towa si kupete oszte shkafowe ako triabwa R</p> <p><b>Body file:</b> mes-150.eml</p>	<p><b>Status:</b> Read</p> <p><b>Account:</b> konstantin@onecoin.eu</p> <p><b>Snippet:</b></p> <p><b>MD5:</b> 05b90e0563c58ffabb43e4d a3ddafe37</p>
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